

CORPORATE OFFICE  
1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 (Phone)  
800.247.8013 (Toll Free)  
515.964.7813 (FAX)

# ALBAUGH, INC.

GEORGIA OFFICE  
P.O. Box 2127  
Valdosta, GA 31604-2127  
229.244.3288 (Phone)  
229.244.5841 (FAX)

FED-X

October 27, 2010

Document Processing Desk (DCI/PRD)  
Mr. Russell Wasem, Chemical Review Manager  
Pesticide Re-evaluation Division (7508P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
2775 South Crystal Drive.  
Arlington, VA 22202

RE: Imidacloprid Registration Review Data Call In  
90-Day Response

Dear Mr. Wasem,

The enclosed submission is Albaugh's 90-Day Response to the Agency's October 8, 2010 Registration Review Data Call-In for Imidacloprid.

As noted by the enclosed requirements Status and Registrant's Response form Albaugh has made an offer to cost share to the other registrants listed in the DCI.

Please call if you have any questions.

Regards,



Morris Gaskins  
Registrations Manager  
Albaugh, Inc.  
229-244-3288



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS  
[www.albaughinc.com](http://www.albaughinc.com)

CORPORATE OFFICE  
1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 (Phone)  
800.247.8013 (Toll Free)  
515.964.7813 (FAX)

# ALBAUGH, INC.

GEORGIA OFFICE  
P.O. Box 2127  
Valdosta, GA 31604-2127  
229.244.3288 (Phone)  
229.244.5841 (FAX)

*Inprocessed*

FED-X

November 22, 2010

Document Processing Desk (DCI/PRD)  
Mr. Russell Wasem, Chemical Review Manager  
Pesticide Re-evaluation Division (7508P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
2775 South Crystal Drive.  
Arlington, VA 22202

RE: Imidacloprid Registration Review Data Call In (Amended)  
90-Day Response

Dear Mr. Wasem,

The enclosed submission is Albaugh's 90-Day Response to the Agency's revised Registration Review Data Call-In for Imidacloprid dated November 10, 2010

As noted by the enclosed requirements Status and Registrant's Response form Albaugh has made an offer to cost share to the other registrants listed in the DCI.

Please call if you have any questions.

Regards,



Morris Gaskins  
Registrations Manager  
Albaugh, Inc.  
229-244-3288

*11/29/10*



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS  
[www.albaughinc.com](http://www.albaughinc.com)

United States Environmental Protection  
Agency Washington, D.C. 20460

OMB Approval 2070-0174

OMB Approval 2070-0107  
OMB Approval 2070-0057

## DATA CALL-IN RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.  
Use additional sheet(s) if necessary.

1. Company Name and Address ALBAUGH INC 1525 NE 36TH STREET ANKENY, IA 50021		2. Case # and Name  Chemical # and Name 129099 Imidacloprid		3. Date and Type of DCI and Number 10-Nov-2010 GENERIC ID # RR-129099-30160	
4. EPA Product Registration	5. I wish to cancel this product regis- tration volun- tarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA regis- tration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
42750-104			✓	N.A.	N.A.
42750-114			✓	N.A.	N.A.
42750-119			✓	N.A.	N.A.
8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.				9. Date	
Signature and Title of Company's Authorized Representative <i>Morris Gaskins</i> <i>Registrations Mgr.</i>				11/22/2010	
10. Name of Company <i>Albaugh, Inc.</i>				11. Phone Number (229) 244-3288	



United States Environmental Protection  
Agency Washington, D.C. 20460

OMB Approval 2070-0174

OMB Approval 2070-0107  
OMB Approval 2070-0057

**REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE**

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.  
Use additional sheet(s) if necessary.

1. Company Name and Address ALBAUGH INC 1525 NE 36TH STREET ANKENY, IA 50021		2. Case # and Name  Chemical # and Name 129099 Imidacloprid		3. Date and Type of DCI and Number 10-Nov-2010 GENERIC ID # RR-129099-30160					
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
	<u>Environmental Fate Data Requirements (Conventional Chemical)</u>								
835.4300	Aerobic aquatic metabolism					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TGAI or PAIRA	24	3
	<u>Nontarget Plant Protection Data Requirements (Conventional Chemical)</u>								
850.4100	Terrestrial plant toxicity, Tier 1 (seeding emergence) (5, 10)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	3
850.4150	Terrestrial plant toxicity, Tier 1 (vegetative vigor) (3, 11, 12)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	3
850.4400	Aquatic plant toxicity test using Lemna spp. Tiers I and II (4)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP or TGAI	12	3
	<u>Post-Application Exposure Data Requirements (Conventional Chemical)</u>								
875.2300	Indoor surface residue dissipation (1, 13, 14)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	3
	<u>Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical)</u>								
850.3040	Field testing for pollinators (2, 15)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	24	3
	<u>Toxicology Data Requirements (Conventional Chemical)</u>								
870.7800	Immunotoxicity					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TGAI	12	3
10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.							11. Date		
Signature and Title of Company's Authorized Representative <i>Morris Gaskins</i> <i>Registrations Mgr</i>							11/22/2010		
12. Name of Company <i>Albaugh, Inc.</i>							13. Phone Number (229) 244-3288		







United States Environmental Protection Agency  
Washington, D.C. 20460  
CERTIFICATION OF ATTEMPT TO ENTER INTO AN  
AGREEMENT WITH REGISTRANTS FOR  
DEVELOPMENT OF DATA

Form Approved.

OMB Nos. 2070-0057;  
2070-0107; 2070-0122;  
2070-0164

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 15 minutes per response including time for reading the instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

Please fill in blanks below

Company Name  
Albaugh, Inc.

Company Number  
42750

Chemical Name  
Imidacloprid

EPA Chemical Number  
129099

I Certify that:

My company is willing to develop and submit the data required by EPA under the authority of the Federal Insecticide, Rodenticide and Fungicide Act (FIFRA), if necessary. However, my company would prefer to enter into an agreement with one or more registrants to develop jointly or share in the cost of developing data.

My firm has offered in writing to enter into such an agreement. That offer was irrevocable and included an offer to be bound by arbitration under section 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms could not be reached otherwise. This offer was made to the following firm(s) on the following date(s):

Name of Firm(s)  
Bayer Enviro, Lanxess Corp., Celsius Property, United Phosphorus, Nufarm, Nufarm Americas, Bayer Cropscience, Hebei Veyong, Advan, Amtide, Control Solutions, Rotam, Source Dynamics, Sharda Worldwide, Ensystex III

Date of Offer  
November 22, 2010

Certification:

I certify that I am duly authorized to represent the company name above, and that the statements that I have made on this form and all attachments therein are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature of Company's Authorized Representative

Date  
11/22/2010

Name and Title (Please Print or Type)  
Morris Gaskins      Registrations Manager